

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF GEORGIA

WILLIAM H. CARTER,

Plaintiff(s),

v.

NCO FINANCIAL SYSTEMS,
INC.,

Defendant(s).

11-CV-00107

DEFENDANT, NCO FINANCIAL SYSTEMS, INC.'S,
REQUEST FOR EXPENSES

Defendant, NCO Financial Systems, Inc. (NCO), through counsel and pursuant to Federal Rule of Civil Procedure 37(a)(5)(B), and the Court's October 10, 2012 order (Dkt. No. 35), respectfully requests its reasonable expenses, including attorney's fees and costs, in the amount of \$2,039.50 incurred in responding to plaintiff's motion to compel, and states:

1. On September 4, 2012, plaintiff filed a motion to compel discovery. (Dkt. No. 21).
2. On September 19, 2012, NCO filed its opposition to plaintiff's Motion to Compel. (Dkt. No. 29).
3. On October 4, 2012, plaintiff filed his response to NCO's opposition. (Dkt. No. 33).

4. On October 10, 2012, this court issued an order denying plaintiff's motion to compel and, under Fed. R. Civ. P. 36(a)(5)(B), directing NCO to file a request for its expenses incurred in opposing plaintiff's motion to compel.

5. NCO's expenses are as follows:

Date	Person	Description	Hours	Cost
9/4/12	Keren Gesund (attorney)	Review and analyze plaintiff's Motion to Compel Discovery; correspondence with plaintiff and discovery production to identify potential defenses; draft letter to plaintiff requesting he redact erroneous statements from the Motion to Compel Discovery.	2.1	\$493.50
9/5/12	Glenn Jones (attorney)	Receipt and review of e-mail from Keren Gesund responding to Plaintiff's Motion to Compel Discovery and regarding his material representations to the court with attached exhibits.	.2	\$33
9/7/12	Glenn Jones (attorney)	Receipt and review of e-mail from Plaintiff regarding his motion to compel and his disputes with discovery responses of Defendants.	.2	\$33
9/11/12	Keren Gesund (attorney)	Begin draft opposition to plaintiff's motion to compel; research to assist.	1.4	\$329
9/14/12	Keren Gesund (attorney)	Prepare follow up correspondence to plaintiff regarding misstatements in his motion to compel, request clarification about the additional discovery he is seeking; complete draft of NCO's opposition to plaintiff's motion to compel; draft affidavit of Keren E. Gesund in support of opposition.	4.3	\$1,010.50
9/14/12	Glenn Jones (attorney)	Review of e-mail from Keren Gesund regarding discovery disputes in responses by Defendants pursuant to Plaintiff's request.	.2	\$33

9/19/12	Whitney Owens (paralegal)	Draft letter to Plaintiff William Carter regarding our Motion in Opposition of Plaintiff's Motion to Compel Discovery.	.2	\$18
9/19/12	Glenn Jones (attorney)	Review of draft of Defendant's Opposition to Plaintiff's Motion to Compel discovery for compliance with local rules in anticipation of filing motion with Court.	.3	\$49.50
9/19/12	Glenn Jones (attorney)	Review of amended Opposition to Plaintiff's Motion to Compel in anticipation of filing with Court.	.1	\$16.50
10/4/12	Keren Gesund (attorney)	Review and analyze plaintiff's reply in support of his motion to compel	.1	\$23.50
		Total		\$2,039.50

Respectfully submitted,
HALL, BOOTH, SMITH, P.C.

s/ Glenn E. Jones

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-and-

s/ Keren E. Gesund

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Counsel for Defendant,
NCO Financial Systems, Inc.

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CASE No. 3:11-CV-00107-DHB-WLB

CERTIFICATE OF SERVICE

I hereby certify that on October 25, 2012, I electronically filed the foregoing: **Defendant, NCO Financial Systems, Inc.'s Request for Expenses** with the Clerk of Court for the Southern District of Georgia by using the CM/ECF System. I also certify that I have mailed by United States Postal Service the document and a copy of the Notice of Electronic Filing to the following non-CM/ECF participants:

William H. Carter, Pro Se
311 Bethel Street
Eastman, Georgia 31023

HALL, BOOTH, SMITH, P.C.

s/ Glenn E. Jones
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